

DANA A. SUNTAG (State Bar #125127)  
JOSHUA J. STEVENS (State Bar #238105)  
HERUM\CRABTREE\SUNTAG  
*A California Professional Corporation*  
5757 Pacific Avenue, Suite 222  
Stockton, California 95207  
Telephone: (209) 472-7700  
[dsuntag@herumcrabtree.com](mailto:dsuntag@herumcrabtree.com)  
[jstevens@herumcrabtree.com](mailto:jstevens@herumcrabtree.com)

Attorneys for All Defendants

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

J.P., a minor, by and through CHANNY  
SOK-HANG as guardian,

Plaintiff,

vs.

CITY OF STOCKTON, et al.

Defendants.

Case No.: 2:21-cv-00788-WBS-AC

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
FOURTH AMENDED COMPLAINT**

**[Local Rule 144(a)]**

**[No hearing required]**

1 This Stipulation is respectfully submitted by all named parties: Plaintiff J.P., by  
2 and through Channy Sok-Hang as guardian, on the one hand; and Defendants City of  
3 Stockton (also named as "Stockton Police Department") (the "City"), Chief of Police  
4 Stanley McFadden, and Officer Jorge Andrade, on the other hand, all through their  
5 undersigned counsel of record.

6 RECITALS

7 A. On May 3, 2021, Plaintiff filed this lawsuit.

8 B. On March 4, 2022, Defendants filed a motion to dismiss portions of  
9 Plaintiff's Third Amended Complaint and a motion to strike. Defendants' motions were  
10 heard on May 2, 2022.

11 C. On May 4, 2022, this Court issued an order granting Defendants' motions  
12 and granting Plaintiff through May 24, 2022, to file a Fourth Amended Complaint. (ECF  
13 No. 49; 8:6-11.) Defendants were given until June 23, 2022 to move, plead, or  
14 otherwise respond to Plaintiff's Fourth Amended Complaint. (ECF No. 49, 8:12-14.)

15 D. Plaintiff filed his Fourth Amended Complaint on May 24, 2022.

16 E. Counsel for the Defendants are busy working on an answering brief on  
17 appeal before the Ninth Circuit, in addition to a number of other matters. Plaintiff's  
18 counsel here represents the plaintiff and appellant in this other matter as well. The  
19 answering brief on appeal is due on June 23, 2022, the same day Defendants' response  
20 to the Fourth Amended Complaint in this matter is due.

21 F. Therefore, the parties agree, subject to Court approval, that Defendants  
22 shall have a short continuance through and including July 5, 2022, to answer the Fourth  
23 Amended Complaint.  
24  
25  
26  
27  
28

STIPULATION

IT IS STIPULATED AND AGREED, by the parties, through their counsel of record, that Defendants have an extension of time, through and including July 5, 2022, to answer the Fourth Amended Complaint.

Dated: June 18, 2022

HERUM CRABTREE SUNTAG  
*A California Professional Corporation*

By: /s/ Joshua J. Stevens  
JOSHUA J. STEVENS  
Attorneys for all Defendants

Dated June 22, 2022


LAW OFFICE OF YOLANDA HUANG  
By: /s/ Yolanda Huang  
YOLANDA HUANG  
Attorney for all Plaintiffs

ORDER

**IT IS SO ORDERED.**

Defendants shall have an extension of time, through and including July 5, 2022, to answer Plaintiff's Fourth Amended Complaint.

Dated: June 22, 2022

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE